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April 13, 2005

**VIA HAND DELIVERY**

The Honorable Gregory M. Sleet  
United States District Court  
J. Caleb Boggs Federal Building  
844 N. King Street  
Room 4324, Lockbox 19  
Wilmington, DE 19801

Re: **In re BroadBand Office, Inc.**  
**Bankr. D. Del., Case No. 01-1720-GMS (Chapter 11)**

Dear Judge Sleet:

This office represents the debtor, BroadBand Office, Inc. (the "Debtor"), in the above-referenced Chapter 11 case. I am pleased to advise the Court that the Debtor and the Official Committee of Unsecured Creditors (the "Committee") are preparing a final draft of a plan to be filed in this case in the very near future, and we are hopeful that the Court will be in a position to consider confirmation of such plan shortly thereafter. Consequently, pursuant to Fed. R. Bankr. P. 3020(b)(1), the Debtor and the Committee are requesting that the Court schedule a hearing on confirmation of the Plan. For efficiency's sake, the Debtor and the Committee are also requesting that the Court consolidate the hearing on approval of the Disclosure Statement with the hearing on confirmation. Therefore, we are requesting that the Court schedule a hearing between June 13, 2005 and June 22, 2005.

During a recent telephone conversation with the Court's scheduling clerk, I was also asked to provide the Court with an update as to matters that are ripe for the Court's consideration. The following are requests for relief that are unopposed and for which the objection deadline has passed. In connection with each of these matters, the applicant has filed and served a certificate of no objection ("CNO") and the Court may determine that a hearing is not necessary for consideration of these matters:

- *Motion for Authority To Sell Shares of Common Stock of Broadsoft, Inc. Free and Clear of Liens, Claims and Encumbrances (Docket No. 957) (CNO with proposed Order filed on 12/22/04; Docket No. 961);*
- *Stipulated Order Resolving Remaining Claims of KPCB Holdings, Inc. and Certain Affiliates and Approving Distribution of Proceeds of Sale of Collateral (Docket No. 962) (CNO with proposed Order filed on 1/13/05; Docket No. 973);*

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- *Joint Motion for Entry of Order Approving the Stipulation Releasing Claims Among Debtors (Docket No. 963) (CNO with proposed Order filed on 1/25/05; Docket No. 985);*
- *Debtor's Application to Employ Sturgill & Associates LLP as Tax Accountant Sturgill & Associates LLP as Tax Accountant (Docket No. 991) (Certification of Counsel with proposed Order filed on 3/4/2005; Docket No. 1002); and*
- *Fourth Omnibus Objection of BroadBand Office, Inc. to Allowance of Certain Administrative Claims (Substantive) (Docket No. 992) (Certification of Counsel with proposed Order filed on 3/15/2005; Docket No. 1025);<sup>1</sup> and*
- *Debtor's Fifth Omnibus Motion for an Order Approving Compromises of Avoidance Claims (Docket No. 1004) (CNO with proposed Order filed on 4/12/05; Docket No. 1029)*

The following additional matters are also pending in this case. Unless the Court instructs otherwise, we will notice these matters for the next scheduled hearing in this case:

- Adversary Proceeding: BroadBand Office, Inc. vs. Atlas Van Lines, Case No. 04-395 (GMS). *Plaintiff's Request for Entry Of Scheduling Order and Order Compelling Defendant's Deposition (Docket No. 9); Answer of Defendant Atlas Van Lines, Inc. In Opposition to Plaintiff's Request for Entry of Order Compelling Defendant's Deposition (Docket No. 10);*
- Adversary Proceeding: BroadBand Office, Inc. vs. Datec Corporation, Case No. 03-690 (GMS). *Plaintiff's Request for Entry Of Scheduling Order and Order Compelling Defendant's Deposition (Docket No. 11); Datec Corporation's Response to Plaintiff's Request for Entry of Scheduling Order and Order Compelling Defendant's Deposition (Docket No. 12); Plaintiff's Reply to Defendant's Response to Plaintiff's Request for Entry of Scheduling Order and Order Compelling Defendant's Deposition (Docket No. 13);*
- Adversary Proceeding: BroadBand Office, Inc. vs. Amerilink LLC, Case No. 04-394 (GMS). *Stipulated Scheduling Order (Docket No. 7); and*

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<sup>1</sup> The Court will note that one response was filed to this pleading, but, as described in the certification of counsel, such response was withdrawn by the filing party.

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- Adversary Proceeding: BroadBand Office, Inc. vs. Ditto Comm. Tech., Inc., Case No. 04-399 (GMS). *Plaintiff's Request for Entry Of Scheduling Order and Order Compelling Defendant's Deposition (Docket No. 10); Response of Defendant Ditto Communications Technologies Inc. to Plaintiff's Request for Entry of Scheduling Order and For Order Compelling Defendant's Deposition and Cross Motion of Defendant for Order Compelling Plaintiff to Answer Interrogatories and Produce Documents in Response to Defendant's Request for Production of Documents (Docket No. 11); Plaintiff's Motion To Strike Cross Motion of Defendant for Order Compelling Plaintiff to Answer Interrogatories and Produce Documents in Response to Defendant's Request for Production Of Documents (Docket No. 12).*

Upon the scheduling of the hearing, we will file and serve a notice of matters scheduled for hearing in accordance with the applicable local rules and furnish the Court with a hearing binder containing copies of all matters to be considered by the Court at the hearing.

I am available at the Court's convenience to answer any questions Your Honor may have regarding this request.

Respectfully submitted,

  
Adam Hiller

cc: David M. Fournier, Esquire  
Evelyn J. Meltzer, Esquire  
Craig Martin, Esquire  
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